

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAFAYETTE DIVISION

CERTAIN UNDERWRITERS
SUBSCRIBING TO GULF COAST MARINE,
LLC POLICIES GCM 14549, GCM 16549,
GCM 23096, GCM 17549 AND GCM 23437

VERSUS

MONCLA MARINE, LLC, ET AL

* NO. 6:20-CV-00795

*

*

*

* JUDGE MICHAEL J. JUNEAU

*

*

* MAG. CAROL B. WHITEHURST

*

JOINT MOTION FOR PARTIAL DISMISSAL

NOW INTO COURT, through undersigned counsel, come:

Plaintiffs, Certain Underwriters Subscribing to Gulf Coast Marine, LLC Policies GCM 14549, GCM 16549, GCM 23096, GCM 17549 and GCM 23437 (collectively “Underwriters”);

Defendants, Lou Henry, John Wayne Hardy, Jarvis Breaux, Evan B. Blanchard and Jennifer Blanchard, individually and on behalf of the minor, Madison Blanchard (collectively the “Individual Defendants”); and

Defendants, Moncla Workover & Drilling Operations, LLC, Moncla Workover & Drilling, LLC, Moncla Offshore Operations, LLC, Moncla E-Line Services, Inc., Moncla Brothers Oilfield Service & Supply, LLC, Brothers Oilfield Service & Supply, LLC, Moncla Trucking, LLC, Moncla Trucking Operations, LLC, Second 4M, Ltd., MFNO, LLC, MF Oil Center, LLC, MF Realty, LLC, R.W.S. Holdings, LLC, MF North Dakota, LLC, MF Alaska, LLC, MF Oil & Gas Investments, LLC, Moncla Pressure Pumping, LLC, Moncla Coiled Tubing, LLC, Moncla P&A, LLC, Location Supply & Specialty, Inc., Moncla Services, Inc., and Moncla Coil Tubing Well Services, LLC (collectively the “Named Assureds”)

who respectfully represent:

1.

All claims, demands, and causes of action asserted in this litigation by and between Underwriters, the Individual Defendants and the Named Assureds have been settled and compromised and should be dismissed with prejudice, with each party to bear its own costs.

2.

This motion does not affect Underwriters' claims against any other defendant in this matter including Wilbert Stewart, Shallow Water Workover & Drilling, LLC f/k/a Moncla Marine, LLC, Moncla Companies Payroll 2016, LLC f/k/a Moncla Companies, LLC, Shallow Water Workover & Drilling Operations, LLC f/k/a Moncla Marine Operations, LLC, and Moncla Offshore, LLC.

3.

This motion does not affect any right or claim of the Named Assureds to coverage or a defense under Gulf Coast Marine, LLC Policies GCM 14549, GCM 16549, GCM 23096, GCM 17549 and GCM 23437.

4.

The Court shall retain jurisdiction over this matter to enforce any settlement agreement(s) between the parties.

WHEREFORE, Underwriters, the Individual Defendants, and the Named Assureds pray that this Joint Motion for Partial Dismissal be granted and for such other and further relief as is appropriate under the circumstances.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing pleading has been served on all counsel of record via the service method indicated below:

- ☐ U.S. Mail
- ☐ Facsimile
- ☐ Hand Delivery
- ☒ Electronic Filing

This 19th day of May, 2021.

/s/ Craig W. Brewer
CRAIG W. BREWER

Respectfully submitted,

STAINES, EPPLING & KENNEY

/s/ Craig W. Brewer
CRAIG W. BREWER (#23665)
JASON R. KENNEY (#29933)
JAMES A. CROUCH, JR. (#35729)
JESSICA B. FINLEY (#38213)
3500 North Causeway Blvd., Suite 820
Metairie, Louisiana 70002
Telephone: (504) 838-0019
Facsimile: (504) 838-0043
*Counsel for Plaintiffs, Certain Underwriters
Subscribing to Gulf Coast Marine, LLC policies
GCM 14549, GCM 16549, GCM 23096, GCM
17549, and GCM 23437*

**MANSFIELD, MELANCON, CRANMER & DICK,
LLC**

/s/ Scott M. Mansfield
SCOTT M. MANSFIELD (#36563)
1921 Kaliste Saloom Road, Suite 203
Lafayette, LA 70508
Telephone: (337) 409-0003
Facsimile: (504) 208-3731
Email: scott@mmcdlaw.com

AND

SPAGNOLETTI LAW FIRM

/s/ Eric J. Rhine
ERIC J. RHINE (*Pro Hac Vice*)
401 Louisiana, 8th Floor
Houston, Texas 77002
Telephone: (713) 653-5600
Facsimile: (713) 653-5656

Counsel for Lou Henry

GALLOWAY JEFcoat, L.L.P.

/s/ Rusty Galloway

RUSTY GALLOWAY (#24100)

ROBERT K. DOGGETT (#37932)

Post Office Box 61550

Lafayette, Louisiana 70596-1550

Telephone: (337) 984-8020

Facsimile: (337) 984-7011

*Counsel for John Wayne Hardy and Jarvis
Breux*

KOPFLER & HERMANN, APLC

/s/ Joseph G. Kopfler

JOSEPH G. KOPFLER (#7838)

7910 Main Street, Suite 400

P. O. Box 3760

Houma, Louisiana 70361-3760

Telephone: (985) 851-3211

Facsimile: (985) 851-4521

*Counsel for Defendants, Evan Blanchard, and
Jennifer L. Blanchard, individually and on behalf
of the minor, Madison Blanchard*

**SCHONEKAS, EVANS, McGOEY &
McEACHIN, L.L.C.**

/s/ Patrick S. McGoeY

Kyle Schonekas (#11817)

Patrick S. McGoeY (#24549)

Andrea V. Timpa (#29455)

909 Poydras Street, Ste. 1600

New Orleans, Louisiana 70112

Telephone: (504) 680-6050

Facsimile: (504) 680-6051

Counsel for the Named Assureds